

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

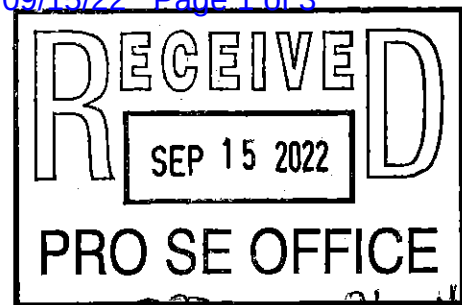
NAKIL L. BROWN,

Plaintiff,

- against -

STEPHEN URBANSKI, JOSEPH DEACON, and
MARK DELBIANCO,

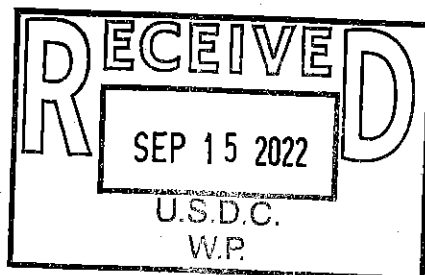
Defendants.



CASE NO. 21 CIV. 214 (CS)

MOTION TO COMPEL
DISCOVERY

PURSUANT TO RULE 37 OF the Federal Rules of Civil Procedures. PLAINTIFF in the above case has been constantly denied documents relevant to this case and in accordance with Rule 26(b)(1) of the Federal Rules of Civil Procedures specifically in plaintiff's second set of request for documents numbers 2, 3, 4, 9, and 11 defendants constantly argue frivolously in objections with such words as overboard, irrelevant, disproportionate to need of case as well as confusing even the request are stated clearly and have all relevant matter as to this case and are appropriate and defendants claim privilege without specifying it in a manner by which is acceptable by court statute I ask that these request be met for withholding discoverable documents which pertains to the case as in violation of Rule 26. Of the Federal Rules of Civil Procedure.



DATED: Sept 9th, 2022

cc: FILE//BORN 16A1000

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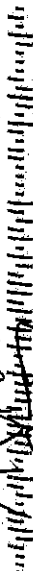
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